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5 *Attorneys for World Corporation*

FILED
Clerk
District Court

MAR 24 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

6
7
8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE**
10 **NORTHERN MARIANA ISLANDS**
11

12
13 YU SUIK CHUNG,

14 Plaintiff,

15 vs.

16 WORLD CORPORATION,

17 Defendant.
18

CIVIL CASE NO. 04-00001

REQUEST FOR STATUS CONFERENCE
REGARDING CONTINUANCE OF APRIL 17,
2006 TRIAL DATE

19 World Corporation ("World") respectfully asks the Court to schedule a status conference
20 at the earliest time the Court is available next week. The purpose of World Corporation's request
21 is to ask that the Court continue the April 17, 2006 trial date in this case to allow sufficient time
22 for transcripts of the previous trial to be prepared.

23 At the request of World, counsel contacted the Official Court Reporter earlier this week
24 and was informed that transcripts of the entire trial could not be completed in time for the April
25 17, 2006 trial date, but that she was working on completing transcripts of certain other witnesses
26 (Kyu Sang Cho, Kyong Lee, and B.K. Park) as well as the closing arguments of defense counsel,
27 pursuant to the Plaintiff's request. Counsel asked if at least the transcripts of the Plaintiff
28 Chung's testimony could be completed in time for the trial and was informed that they could not

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1 he completed due to time and scheduling constraints. It was discussed whether the assistance of
2 other court reporters in Saipan or Guam could be obtained to assist with the transcription of the
3 tapes. The Official Court Reporter was helpful in securing the assistance of another court
4 reporter in the CNMI to perform the transcription of 10 of the tapes; however, another 24 tapes
5 remain just with respect to the Plaintiff's testimony. Counsel has contacted court reporters on
6 Guam to discuss whether they would be available to assist in the transcription of the remaining 24
7 tapes of the Plaintiff's testimony, but has been informed that it could take up to 2 months just to
8 complete the transcription. See letter and email from Cecille A. Flores, CSR, attached hereto as
9 Exhibit A. Furthermore, the process would involve the court reporter traveling to Saipan in order
10 to duplicate the tapes which are in the custody of the Official Court Reporter. The duplication
11 process would also involve additional time.

12 **RESPECTFULLY SUBMITTED THIS 24TH DAY OF MARCH, 2006.**

13 **DAVID J. LUJAN, ESQ.**
14 **IGNACIO C. AGUIGUI, ESQ.**
15 **LUJAN AGUIGUI & PEREZ LLP**

16 By: 
17 **IGNACIO C. AGUIGUI, ESQ.**

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EXHIBIT A

FLORES COURT REPORTING

.....Guardians of the Record
Suite 2E, Jugo Building
618 Route 8
Barrigada, Guam 96913
Tel: 671.734.1041 * Fax: 671.734.1045

Cecilia F. Flores
Veronica A. Flores

Cecilia A. Flores

March 23, 2006

Mr. Ignacio C. Aguiqui, Esq.
LUJAN AGUIGUI PEREZ
Suite 300, Pacific News Building
238 Archbishop Flores Street
Hagatna, Guam 96910

Dear Mr. Aguiqui:

This letter is in response to your request for tape duplication and transcription services.

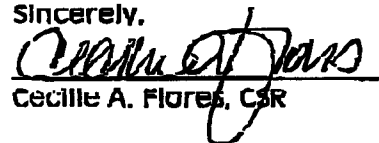
Veronica and I feel that two months is more than sufficient time. We could possibly get it to you sooner but prefer to keep the deadline at two months just to be safe because we don't know the quality of the recording. If the recording quality is poor, it could definitely slow us down.

The cost per page for translated testimony is \$3.25.

Since I would be spending a few days there, it would only be fair that I charge you appropriately for my time and that you incur all expenses such as hotel, transportation, etc.

If you have any other questions or concerns, please call me at 734.1041 or 777.1362.

Sincerely,


Cecilia A. Flores, CSR

Donna M. Gogue

From: Cecille Flores [ccilloflores@hotmail.com]

Sent: Wednesday, March 22, 2006 8:38 PM

To: dgogue@lujanaguiguierez.com

Donna:

I don't have Ike's email so please forward this to him.

Thanks, Cecille

Ike:

I was talking to my dad and he said that if you have 24 master tapes, it'll double so that would mean 48, plus or minus in the end. He also said that it takes him about five hours to dubb four tapes (both side A and B).

With that, it'll definitely take me more than a day to do it. So if you're willing to pay all the expenses..... (Of course if you can think of a more economical way to do it, it would definitely save you money.

You don't know anyone over there who has a duplicator?

I'd love to help you out, but I know you said you'll need it by next month and quite honestly, I don't think I can get it to you by then. I can go over there and do the dubbing and bring it back, but I'll need help with the transcribing. Beyond Veronica.

Another thing is the scheduling. We have five depositions between this Thursday and next week Tuesday so I won't be able to leave till next Wednesday.

It's up to you. Let me know. Sorry I didn't get back to you today. I was in a depo all day with Delia and Kin Arriola.

Cecille

Express yourself instantly with MSN Messenger! [MSN Messenger](#) Download today it's FREE!

3/24/2006

PROOF OF SERVICE

I certify that a true and correct copy of the foregoing Request for Status Conference and the accompanying Proposed Order will at my direction be served on the following via facsimile on March 24, 2006:

Colin M. Thompson, Esq.
PMB 917 Box 10001
Saipan, MP 96950
Fax: (670) 233-0776

Robert T. Torres, Esq.
P.O. Box 503758 CK
Saipan, MP 96950
Fax: (670) 234-5749


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